

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA)	
)	
v.)	Criminal No. 2:21-CR-00079-RJC
)	
SUSAN GILBERT)	

JOINT MOTION FOR CONTINUANCE

AND NOW comes the United States of America, by its attorneys, Stephen R. Kaufman, Acting United States Attorney for the Western District of Pennsylvania, and Karen Gal-Or, Robert Cessar, and Nicole Stockey, Assistant United States Attorneys for said District, and Jonathan Meltz, counsel for Defendant Susan Gilbert, and hereby jointly submit this request for a 90-day continuance in this matter. For the reasons set forth below, the Court should grant the parties' joint motion.

1. On July 22, 2021, this Court scheduled a status conference for October 28, 2021 (Doc 34).

2. The parties continue to engage in fact-finding as well as discussions regarding potential resolution. The parties request additional time to permit them to more fully explore the law and the particular circumstances associated with this case, especially given the complex nature of this matter.

3. The parties request that the status conference currently scheduled for October 28, 2021 be continued for a period of at least 90 days. Accordingly, the parties request that the 90-day delay be deemed excludable under the Speedy Trial Act 18 U.S.C. § 3161. Specifically, the parties ask the Court to find that the ends of justice served by granting this continuance outweigh the best interest of the public and the defendant to a speedy trial, 18 U.S.C. § 3161(h)(7)(A).

WHEREFORE, for the reasons set forth above, the Court should grant the Motion and a continuance for at least 90 days from October 28, 2021 to a time and date that is most convenient for the Court.

Respectfully submitted,

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